

**WILLKIE FARR & GALLAGHER LLP**

BENEDICT Y. HUR (SBN: 224018)

bhur@willkie.com

SIMONA AGNOLUCCI (SBN: 246943)

sagnolucci@willkie.com

EDUARDO E. SANTACANA (SBN: 281668)

esantacana@willkie.com

LORI C. ARAKAKI (SBN: 315119)

larakaki@willkie.com

ARGEMIRA FLOREZ (SBN: 331153 )

aflorez@willkie.com

Attorneys for  
GOOGLE LLC

**UNITED STATES DISTRICT COURT**

**NORTHERN DISTRICT OF CALIFORNIA**

**SAN FRANCISCO**

ANIBAL RODRIGUEZ, *et al.* individually and on  
behalf of all other similarly situated,

Plaintiffs,

vs

GOOGLE LLC, *et al.*

Defendant.

Case No. 3:20-CV-04688

**DECLARATION OF EDUARDO E.  
SANTACANA IN SUPPORT OF  
DEFENDANT GOOGLE LLC'S  
MOTION TO DISMISS COUNTS I AND  
II OF SECOND AMENDED  
COMPLAINT**

The Honorable Richard Seeborg  
Courtroom 3 – 17th Floor  
Trial Date: Not Yet Set

Date: August 12, 2021  
Time: 1:30 p.m.  
Place: Courtroom 3 - 17th Floor  
Judge: Hon. Richard Seeborg

1 I, Eduardo E. Santacana, declare as follows:

2 1. I am an attorney duly licensed to practice law in the State of California. I am a  
3 partner with the law firm of Willkie Farr & Gallagher LLP, counsel of record for Google LLC in  
4 the above-captioned matter. I have personal knowledge of the facts set forth below and, if called  
5 as a witness in a court of law, could and would testify competently thereto.

6 2. Attached hereto as **Exhibit 1** is a true and correct copy of Google's Terms of  
7 Service agreement in effect on March 31, 2020, which was downloaded on June 24, 2021 at:  
8 <https://policies.google.com/terms?hl=en-US>

9 3. Attached hereto as **Exhibit 2** is a true and correct copy of Google's Terms of  
10 Service agreement in effect on October 25, 2017, which was downloaded on June 24, 2021 at:  
11 <https://policies.google.com/terms/archive/20171025?hl=en-US>

12 4. Attached hereto as **Exhibit 3** is a true and correct copy of Google's Terms of  
13 Service agreement in effect on April 14, 2014, which was downloaded on June 24, 2021 at:  
14 <https://policies.google.com/terms/archive/20140414?hl=en-US>

15  
16 I declare under penalty of perjury that the foregoing is true and correct. Executed on  
17 June 25, 2021.

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19 By: /s/ Eduardo E. Santacana  
20 Eduardo E. Santacana  
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